

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

Jane Doe 1, individually)	
and on behalf of all others similarly)	Case No. 1:22-cv-10018-JSR
situated,)	
)	
Plaintiff,)	
)	
)	
v.)	
)	
Deutsche Bank)	
Aktiengesellschaft,)	
Deutsche Bank AG New York)	
Branch, Deutsche Bank Trust)	
Company Americas,)	
)	
Defendants.)	
<hr style="width: 40%; margin-left: 0;"/>		

**DECLARATION OF CATHERINE NOWNES
REGARDING COMPLIANCE WITH 28 U.S.C. § 1715**

I, CATHERINE NOWNES hereby declare and state as follows:

1. My name is Catherine Nownes, I am over the age of 21, and I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.
2. I am the Chief Operating Officer for Omni Agent Solutions, Inc. (“Omni”), a firm that specializes in, among other things, legal noticing and claims management.
3. Omni is a firm with more than 50 years of experience in claims processing, legal noticing and settlement administration. Omni’s case administration services include coordination of all noticing requirements, establishment of fulfillment services, receipt and processing of voting ballots and opt-outs, coordination with the United States Postal Service, claims database management, funds management and distribution services.
4. The facts in this Declaration are based on what I personally know, as well as

information provided to me in the ordinary course of my business by my colleagues at Omni.

CAFA NOTICE IMPLEMENTATION

5. At the direction of counsel for the Defendants Deutsche Bank, Aktiengesellschaft, Deutsche Bank AG New York, Branch, Deutsche Bank Trust Company Americas, 62 officials, which included the Attorney General of the United States and the Attorneys General of each of the 50 states, the District of Columbia and U.S. Territories and three banking and regulatory offices were identified to receive notices (“CAFA Notices”) required under the Class Action Fairness Act, 28 U.S.C. § 1715 (“CAFA”).

6. Omni maintains a list of most of these state and federal officials with contact information for the purpose of providing CAFA Notices. Prior to mailing, all the names and addresses were verified, then run through the Coding Accuracy Support System (“CASS”) maintained by the United States Postal Service (“USPS”).¹

7. On June 28, 2023, Omni served 80 CAFA Notices. The CAFA Notices were mailed by USPS Priority Mail to the Attorneys General of each of the 50 states, the District of Columbia and the U.S. Territories, as well as several banking and regulatory offices.² A copy of the CAFA Notice that was served is attached hereto as **Exhibit 1**. The CAFA Notice Service List is attached hereto as **Exhibit 2**.

8. As set forth in the CAFA Notices, the documents required to be shared with relevant officials have been posted on a website hosted by Omni dedicated to the settlement in this action, which can be accessed at: www.epsteinSSFDB.com.

¹ CASS improves the accuracy of carrier route, 5-digit ZIP®, ZIP + 4® and delivery point codes that appear on mail pieces. The USPS makes this system available to mailing firms who want to improve the accuracy of postal codes, i.e., 5-digit ZIP®, ZIP + 4®, delivery point (DPCs), and carrier route codes that appear on mail pieces.

² Out of an abundance of caution, and as set forth on Exhibit 2, certain of the recipients were served the notice at more than one address.

9.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 14, 2023

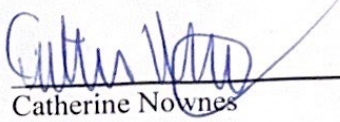

Catherine Nownes

Exhibit 1



ROPES & GRAY LLP
1211 AVENUE OF THE AMERICAS
NEW YORK, NY 10036-8704
WWW.ROPESGRAY.COM

June 28, 2023

Lisa H. Bebachick
T +1 212 596 9740
lisa.bebchick@ropesgray.com

BY USPS PRIORITY MAIL

**Re: Notice of Proposed Class Action Settlement Pursuant to the
Class Action Fairness Act (28 U.S.C. § 1715)**

To Whom It May Concern:

We represent Defendants Deutsche Bank Aktiengesellschaft, Deutsche Bank AG New York Branch, and Deutsche Bank Trust Company Americas (collectively, “Deutsche Bank” or “Defendants”) in the class action captioned *Jane Doe 1 v. Deutsche Bank Aktiengesellschaft, et al.*, Case No. 22-cv-10018-JSR (S.D.N.Y.) (the “Action”).

You are hereby notified, pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. § 1715 (“CAFA”), that an Amended Stipulation of Settlement, dated June 16, 2023 (the “Stipulation”), reflecting the terms of a proposed settlement of all claims in this Action was filed in the United States District Court for the Southern District of New York on June 27, 2023 (ECF No. 94-1).¹

To avoid unnecessary expense and burden on the recipients of this Notice that would result from multiple, redundant notices, a single Notice is being sent on behalf of all Defendants. By doing so, Defendants do not concede or take the position that each recipient of this Notice has regulatory authority or supervisory responsibility over each Defendant, or licenses or otherwise authorizes each Defendant to conduct business, or that some or all of the matters alleged in the Action are subject to such regulation.

The Stipulation sets forth the following proposed settlement class:

“Class” means all women who were sexually abused or trafficked by Jeffrey Epstein and/or his associates during the time period between August 19, 2013 to August 10, 2019, including, but not limited to: (1) girls under the age of 18 who engaged in sexual contact with Epstein and/or a person associated with Epstein, and received money or something

¹ The Stipulation was also appended as Exhibit 1 to the Joint Declaration of David Boies and Bradley Edwards in Support of Class Representative Jane Doe 1’s Amended Motion for Preliminary Approval of Class Action Settlement (ECF No. 90-1), which Plaintiff Jane Doe 1 (“Plaintiff”) filed on June 16, 2023.

ROPES & GRAY LLP

- 2 -

June 28, 2023

else of value in exchange for engaging in that sexual contact (even if the sexual contact was perceived to be consensual); (2) women aged 18 or older who were forced, coerced, or defrauded into engaging in sexual contact by Epstein and/or his associates by, for example, using physical force, threatening serious harm or legal action, making a false promise, or causing them to believe that not engaging in sexual contact would result in serious harm, and who received money or something else of value in exchange for engaging in that sexual contact; and (3) girls or women of any age whom Epstein and/or a person associated with Epstein engaged in sexual contact without consent (even if the sexual contact was perceived to be consensual provided that the girl or woman was under the age of 18 at the time of engaging in that contact). Defendants stipulate, agree, and consent to the definition of “Class” for the sole purpose of the Settlement, and without prejudice to their right to challenge class certification and/or the class definition in the event that this Stipulation or the Settlement is terminated or the Effective Date otherwise fails to occur for any reason.

In connection with the settlement, a website has been established and which contains the following documents associated with the case, among others:

1. The First Amended Class Action Complaint, dated January 13, 2023 (ECF No. 42) and the Class Action Complaint, dated November 24, 2022 (ECF No. 1). *See* 28 U.S.C. § 1715(b)(1).
2. The Stipulation (available at both ECF No. 90-1 and ECF No. 94-1). *See* 28 U.S.C. § 1715(b)(4).
3. The Court’s Amended Order Granting Preliminary Approval Pursuant to Fed. R. Civ. P. 23(e)(1) and Permitting Notice to the Class, dated June 27, 2023 (the “Amended Approval Order,” ECF No. 95), *see* 28 U.S.C. § 1715(b)(8), which provides notice of a final settlement hearing to be held before the Court on October 20, 2023 at 4:00 p.m. E.D.T., *see* 28 U.S.C. § 1715(b)(2).
4. Copies of the final Notice of Proposed Settlement of Class Action, settlement claim forms, and opt-out forms that have made available to actual or potential members of the settlement class (translated copies are also available in Russian, Ukrainian, and Polish). *See* 28 U.S.C. § 1715(b)(3).
5. The proposed form of order and final judgment, which was submitted to the Court in connection with Plaintiff’s motion for preliminary approval, and which the parties will ask the Court to enter to dismiss the action with prejudice and grant final approval of the settlement (ECF No. 89-2). *See* 28 U.S.C. § 1715(b)(6).

ROPES & GRAY LLP

- 3 -

June 28, 2023

The settlement website can be accessed at: www.epsteinSSFDB.com.

Please note that the parties to the Stipulation signed a confidential Term Sheet, which is referenced in the Stipulation and which was not filed with the Court. *See* 28 U.S.C. § 1715(b)(5). One of the purposes of the confidential Term Sheet is to provide Deutsche Bank with the option to terminate the proposed settlement if timely requests for exclusion from the settlement class are submitted by eligible settlement class members subject to the conditions set forth in the Term Sheet. It is typical for agreements of this nature to remain confidential because, as explained by a leading treatise dealing with complex litigation, “[k]nowledge of the specific number of opt outs that will vitiate a settlement might encourage third parties to solicit class members to opt out.” Fed. Judicial Ctr., Manual for Complex Litigation (4th ed.) § 21.631. If, however, the Court subsequently orders the public filing of the Term Sheet, the Term Sheet will also be posted to the above-referenced website.

As set forth in the Amended Approval Order, the Court preliminarily approved the settlement on June 27, 2023 and scheduled an in-person final settlement approval hearing for Friday, October 20, 2023, at 4:00 p.m. EDT, at Daniel Patrick Moynihan United States Courthouse, Courtroom 14B, 500 Pearl Street, New York, New York 10007.

As of the date of this Notice, there is no judicial opinion regarding the settlement other than the Amended Approval Order (and original approval order dated June 16, 2023, which was superseded by the Amended Approval Order), and no final judgment or notice of dismissal. *See* 28 U.S.C. § 1715(b)(8). Moreover, as of the date of this Notice, Deutsche Bank is unable to provide an estimate of the number of class members residing in each state, or the proportionate share of the claims of such members to the entire proposed settlement, in part, because the identities and residencies of the potential class members are not presently known to Deutsche Bank. *See* 28 U.S.C. § 1715(b)(7). In addition, Deutsche Bank cannot feasibly estimate the proportionate share of claims in each state because the amount of each class member’s claimed damages will be unknown until the settlement claims administration process is well underway. *Id.*

The foregoing information is provided based on the status of the proceedings as of the date of this Notice and on the data currently available to Deutsche Bank.

If you have questions about how to access and view the documents on the website, please contact the settlement claims administrator:

Simone Lelchuk
c/o Frejka PLLC
415 East 52nd Street, Suite 3
New York, New York 10022
212-641-0800
Simone.K.Lelchuk@gmail.com

ROPES & GRAY LLP

- 4 -

June 28, 2023

If you have any questions about this Notice or the settlement referenced herein, please feel free to contact me.

Sincerely,

/s/ Lisa H. Bebchick

Lisa H. Bebchick

[Addresses identified on list annexed hereto]

VIA USPS PRIORITY MAIL

ROPES & GRAY LLP

- 5 -

June 28, 2023

LIST OF CAFA NOTICE RECIPIENTS

Attorney General of the United States
Office of the Alaska Attorney General
Office of the Alabama Attorney General
Office of the Arkansas Attorney General
Office of the Arizona Attorney General
Office of the Attorney General California
Office of the Colorado Attorney General
State of Connecticut Attorney General's Office
District of Columbia Attorney General's Office
Delaware Attorney General
Office of the Attorney General of Florida
Office of the Georgia Attorney General
Office of the Hawaii Attorney General
Iowa Attorney General
State of Idaho Attorney General's Office
Illinois Attorney General
Indiana Attorney General's Office
Kansas Attorney General
Office of the Kentucky Attorney General
Office of the Louisiana Attorney General
Office of the Attorney General of Massachusetts
Office of the Maryland Attorney General
Office of the Maine Attorney General
Office of the Michigan Attorney General
Attorney General Minnesota
Missouri Attorney General's Office
Mississippi Attorney General's Office
Office of the Montana Attorney General
Office of the North Carolina Attorney General
North Dakota Office of the Attorney General
Office of the Nebraska Attorney General
New Hampshire Attorney General
Office of the New Jersey Attorney General
Office of the New Mexico Attorney General
Nevada Attorney General
Office of the New York Attorney General
Ohio Attorney General
Oklahoma Office of the Attorney General
Office of the Oregon Attorney General

ROPES & GRAY LLP

- 6 -

June 28, 2023

Pennsylvania Office of the Attorney General
Rhode Island Office of the Attorney General
South Carolina Attorney General
South Dakota Office of the Attorney General
Tennessee Attorney General and Reporter
Attorney General of Texas
Utah Office of the Attorney General
Office of the Virginia Attorney General
Office of the Attorney General of Vermont
Washington State Office of the Attorney General
Office of the Wisconsin Attorney General
West Virginia Attorney General
Office of the Wyoming Attorney General
American Samoa Attorney General
Attorney General Office Guam
Northern Mariana Islands Attorney General
Puerto Rico Attorney General
Virgin Islands Attorney General
Department of Justice for the Federated States of Micronesia
Office of the Attorney General Marshall Islands
Federal Reserve Bank of New York
New York State Department of Financial Services
Securities and Exchange Commission District of Columbia

Exhibit 2

Creditor	Address1	Address2	Address3	Address4	Address5
Arizona Attorney General's Office – CSS	P.O. Box 6123, MD 7611	Phoenix, AZ 85005-6123			
Dept of Justice Secretary	Attn: The Honorable Jose R. Gallen	PS105, Palikir	Pohnpei State, FM 96941		
Federal Reserve Bank of New York	33 Liberty St	New York, NY 10045			
NYS Dept of Financial Services	Office of General Counsel	1 State St	New York, NY 10004-1511		
Office of the Attorney General	Attn: Steve Marshall	State of Alabama	501 Washington Ave	Montgomery, AL 36104	
Office of the Attorney General	Attn: Clyde Ed Sniffen, Jr	1031 W 4th Ave, Ste 200	Anchorage, AK 99501-1994		
Office of the Attorney General	Attn: Mark Brnovich	2005 N Central Ave	Phoenix, AZ 85004		
Office of the Attorney General	Attn: Leslie Rutledge	323 Center St, Ste 200	Little Rock, AR 72201-2610		
Office of the Attorney General	California Dept of Justice	P.O. Box 944255	Sacramento, CA 94244-2550		
Office of the Attorney General	Consumer Law Section	Attn: Bankruptcy Notices	455 Golden Gate Ave, Ste 11000	San Francisco, CA 94102-7004	
Office of the Attorney General	Attn: Xavier Becerra	1300 I St, Ste 1740	Sacramento, CA 95814		
Office of the Attorney General	Attn: Maura Healey	10 Mechanic St, Ste 301	Worcester, MA 01608		
Office of the Attorney General	Attn: Phil Weiser	Ralph L Carr Colorado Judicial Ctr	1300 Broadway, 10th Fl	Denver, CO 80203	
Office of the Attorney General	Attn: William Tong	165 Capitol Ave	Hartford, CT 06106		
Office of the Attorney General	Attn: Kathy Jennings	Carvel State Office Bldg	820 N French St	Wilmington, DE 19801	
Office of the Attorney General	Attn: Karl A Racine	400 6th St NW	Washington, DC 20001		
Office of the Attorney General	441 4th St NW, Ste 1100 S	Washington, DC 20001			
Office of the Attorney General	Attn: Ashley Moody	The Capital, PL 01	Tallahassee, FL 32399-1050		
Office of the Attorney General	Attn: Chris Carr	40 Capital Sq SW	Atlanta, GA 30334-1300		
Office of the Attorney General	Attn: Clare E Connors	425 Queen St	Honolulu, HI 96813		
Office of the Attorney General	Attn: Lawrence Wasden	700 W Jefferson St, Ste 210	P.O. Box 83720	Boise, ID 83720-1000	
Office of the Attorney General	601 S University Ave	Carbondale, IL 62901			
Office of the Attorney General	500 S 2nd St	Springfield, IL 62701			
Office of the Attorney General	Attn: Kwame Raoul	James R Thompson Ctr	100 W Randolph St	Chicago, IL 60601	
Office of the Attorney General	Attn: Todd Rokita	Indiana Govt Ctr S	302 W Washington St, 5th Fl	Indianapolis, IN 46204	
Office of the Attorney General	Attn: Tom Miller	Hoover State Office Bldg	1305 E Walnut	Des Moines, IA 50319	
Office of the Attorney General	Attn: Derek Schmidt	120 SW 10th Ave, 2nd Fl	Topeka, KS 66612-1597		
Office of the Attorney General	Attn: Daniel Cameron	700 Capitol Ave, Ste 118	Capitol Bldg	Frankfort, KY 40601	
Office of the Attorney General	Attn: Jeff Landry	300 Capital Dr	Baton Rouge, LA 70802		
Office of the Attorney General	Attn: Aaron Frey	State House Stn 6	Augusta, ME 04333		
Office of the Attorney General	Attn: Brian Frosh	200 St Paul Pl	Baltimore, MD 21202-2202		
Office of the Attorney General	Attn: Maura Healey	1 Ashburton Pl, 20th Fl	Boston, MA 02108-1698		
Office of the Attorney General	Attn: Dana Nessel	P.O. Box 30212	525 W Ottawa St	Lansing, MI 48909-0212	
Office of the Attorney General	Attn: Dana Nessel	Cadillac Place, 10th Fl	3030 W Grand Blvd	Detroit, MI	
Office of the Attorney General	Attn: Keith Ellison	445 Minnesota St, Ste 1400	Saint Paul, MN 55101		
Office of the Attorney General	Attn: Lynn Fitch	Department of Justice	550 High St	P.O. Box 220	Jackson, MS 39205
Office of the Attorney General	Walter Sillers Bldg	550 High St, Ste 1200	Jackson, MS 39201		
Office of the Attorney General	Attn: Eric Schmitt	815 Olive St, Ste 200	St Louis, MO 63101		
Office of the Attorney General	Attn: Eric Schmitt	615 E 13th St, Ste 401	Kansas City, MO 64106		
Office of the Attorney General	Attn: Eric Schmitt	2311 Bloomfield St, Ste 106	Cape Girardeau, MO 63703		
Office of the Attorney General	Attn: Eric Schmitt	Supreme Court Bldg	207 W High St	Jefferson City, MO 65101	
Office of the Attorney General	Supreme Court Bldg	P.O. Box 899	Jefferson City, MO 65102		
Office of the Attorney General	Justice Bldg, 3rd Fl	215 N Sanders	P.O. Box 201401	Helena, MT 59620-1401	
Office of the Attorney General	Attn: Doug Peterson	2115 State Capitol	P.O. Box 98920	Lincoln, NE 68509-8920	
Office of the Attorney General	345 State Capitol	Lincoln, NE 68509			
Office of the Attorney General	Attn: Aaron D Ford	Old Supreme Court Bldg	100 N Carson St	Carson City, NV 89701	
Office of the Attorney General	Attn: John Formella	33 Capitol St	Concord, NH 03301		
Office of the Attorney General	Attn: Matthew J Platkin	Richard J Hughes Justice Complex	25 Market St	P.O. Box 080	Trenton, NJ 08625
Office of the Attorney General	Attn: Hector Balderas	P.O. Drawer 1508	Santa Fe, NM 87504-1508		
Office of the Attorney General	Attn: Letitia A James	Dept of Law	The Capitol, 2nd Fl	Albany, NY 12224	
Office of the Attorney General	9001 Mail Service Ctr	Raleigh, NC 27699-9001			
Office of the Attorney General	Attn: Wayne Stenehjem	State Capital	600 E Boulevard Ave, Dept 125	Bismarck, ND 58505-0040	
Office of the Attorney General	Attn: Dave Yost	State Office Tower	30 E Broad St	Columbus, OH 43266-0410	
Office of the Attorney General	Attn: John M O'Conner	313 NE 21st Str	Oklahoma City, OK 73105		
Office of the Attorney General	Attn: Ellen F Rosenblum	1162 Court St, NE	Justice Bldg	Salem, OR 97301	
Office of the Attorney General	Attn: Josh Shapiro	Strawberry Sq, 16th Fl	Harrisburg, PA 17120		
Office of the Attorney General	Attn: Domingo Emanuel Hernandez	Torre Chardón, Ste 1201	350 Carlos Chardón St	San Juan, PR 00918	
Office of the Attorney General	Attn: Peter F Neronha	150 S Main St	Providence, RI 02903		
Office of the Attorney General	Attn: Alan Wilson	Rembert D Dennis Office Bldg	P.O. Box 11549	Columbia, SC 29211-1549	
Office of the Attorney General	Attn: Mark Vargo	1302 E Hwy 14, Ste 1	Pierre, SD 57501-8501		
Office of the Attorney General	Attn: Maura Healey	105 William St, 1st Fl	New Bedford, MA 02740		
Office of the Attorney General	Attn: Herbert H Slaterry, III	P.O. Box 20207	Nashville, TN 37202-0207		
Office of the Attorney General	Attn: Herbert H Slaterry, III	425 5th Ave N	Nashville, TN 37243		
Office of the Attorney General	Attn: Ken Paxton	Capital Station	P.O. Box 12548	Austin, TX 78711-2548	
Office of the Attorney General	P.O. Box 142320	Salt Lake City, UT 84114-2320			
Office of the Attorney General	Attn: Susan R Young	109 State St	Montpelier, VT 05609-1001		
Office of the Attorney General	Attn: Jason Miyares	202 N 9th St	Richmond, VA 23219		
Office of the Attorney General	800 5th Ave, Ste 2000	Seattle, WA 98104			
Office of the Attorney General	Attn: Bob Ferguson	1125 Washington St SE	P.O. Box 40100	Olympia, WA 98504-0100	
Office of the Attorney General	Attn: Patrick Morrissey	State Capitol Complex, Bldg 1, Rm E-26	1900 Kanawhe Blvd E	Charleston, WV 25305	
Office of the Attorney General	Attn: Maura Healey	1441 Main St, 12th Fl	Springfield, MA 01103		
Office of the Attorney General	Attn: Josh Kaul	Wisconsin Dept of Justice	State Capital, Rm 114 E	P.O. Box 7857	Madison, WI 53707-7857
Office of the Attorney General	Attn: Bridget Hill	Kendrick Building	2320 Capitol Ave	Cheyenne, WY 82002	
Office of the Attorney General	Dept of Legal Affairs	P.O. Box 7	Utulei, American Samoa		
Office of the Attorney General	590 S Marine Corps Dr, Ste 901	Tamuning, GU 96913			
Office of the Attorney General	Caller Box 10007	Saipan, MP 96950			
Office of the Attorney General	3438 Krondprindsens	Gade GERS Bldg, 2nd Fl	St Thomas, VI 00802		
Office of the Attorney General	P.O. Box 890	Majuro, MH 96960			
Securities & Exchange Commission of District of Columbia	c/o Philadelphia Regional Office	One Penn Center	1617 JFK Blvd, Ste 520	Philadelphia, PA 19103	
US Attorney General	US Dept of Justice	950 Pennsylvania Ave NW	Washington, DC 20530-0001		